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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

0 IN RE: SOCIAL MEDIA ADOLESCENT
1 ADDICTION/PERSONAL INJURY
1 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

3 THIS DOCUMENT RELATES TO:
ALL ACTIONS

**OMNIBUS SEALING STIPULATION
REGARDING DKT. NO. 1974**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5 and the Court’s May 22, 2023, Protective Order (Dkt. No. 290) and August 1, 2023, Order Granting Motion to File Under Seal; Setting Sealing Procedures (Dkt. No. 341), Defendants YouTube, LLC and Google LLC (collectively, “YouTube”) and Plaintiffs (collectively, the “Parties”) submit this Omnibus Sealing Stipulation in connection with the Parties’ Joint Letter Brief re YouTube’s Search and Production from Noncustodial Source “B” (ECF No. 1974).

At this time, Plaintiffs do not oppose the sealing request and reserve all rights to challenge designations and sealing in the future. Accordingly, the Parties stipulate to the following chart.

I. UNDISPUTED REQUESTS TO MODIFY PROVISIONAL REDACTIONS

Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
1974	Joint Letter Brief re YouTube's Search and Production from Noncustodial Source "B"	Maintain provisional redactions at 1-5, with undisputed modifications to remove redactions from (a) four bulleted items on page 1, (b) the paragraph running from page 1-2, and (c) footnote 7	Good cause exists to seal sensitive and confidential information about YouTube's platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. See Declaration of Christopher Chiou ("Chiou Decl.") at 2.	A party has not previously sought to seal the same information.

IT IS SO STIPULATED AND AGREED.

Respectfully submitted,

DATED: June 13, 2025

WILSON SONSINI GOODRICH & ROSATI

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By: /s/ Christopher Chiou

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ATTESTATION

I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: June 13, 2025

By: /s/ Christopher Chiou

Christopher Chiou